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April 14, 1997

VIA HAND DELIVERY

Mr. William F. Caton

Acting Secretary

Federal Communications Commission

1919 M Street, NW, Room 222

Washington, D.C. 20554

RECEIVED

APR 14 1997

Federal Communications Commission
Office of Secretary

RE: Ex Parte from Ben G. Almond of BellSouth dated April 9, 1997
Payphone Reclassification Proceeding
CC Docket No. 96-128. Order (Common Carrier Bureau, April 4, 1997)

Dear Mr. Caton:

I am writing on behalf of the Southeastern Public Communications Coalition ("SPCC")¹ in response to the April 9, 1997 ex parte of Ben G. Almond on behalf of BellSouth in the above referenced matter. The SPCC strenuously disagrees with BellSouth's statement that "as of this date, there are no payphone-specific, network-based, unbundled features and functions provided to others or taken by BellSouth's payphone operations that are tariffed by BellSouth at the intrastate level."

The Order addresses the LEC federal tariffing requirements in two ways. First, it names specific unbundled features that, if tariffed at the state level, "must be federally tariffed." These include "answer supervision, call screening,"² "call blocking, coin supervision additive, coin signaling transmission additive, coin rating, original line number screening, and IDDD blocking."³ The Order also generally requires LECs to tariff all other "payphone specific,

¹The SPCC is a Coalition of public telecommunications associations representing the nine BellSouth states. The members of these state associations include independent PSPs, Operator Service Providers, Long-Distance Carriers, and other telecommunications-related companies operating in each state. Each association acts as an advocate for the public payphone industry and engages in educational, and "self-regulatory" activities to help ensure the responsible provision of pay telephone services to the public.

²Order, ¶ 18.

³Id., footnote 49.

(Continued . . .)

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network-based, unbundled features and functions provided to others or taken by a LEC's operations. . . .⁴ The meaning of the term "payphone-specific" is then clearly delineated:

... we do not include in this federal tariffing requirement features and functions that are generally available to all local exchange customers and are only incidental to payphone service, such as touchtone services and various custom calling features. [emphasis added]

BellSouth offers each of the central office blocking and screening features listed in the Order on an unbundled basis in each BellSouth state except Georgia and Florida. BellSouth also offers Billed Number Screening on an unbundled basis in at least Alabama and South Carolina. A copy of the BellSouth's South Carolina tariff for these unbundled features is attached as Exhibit 1.⁵

Inexplicably, BellSouth fails in its ex parte to either mention these unbundled features, or provide the required commitment to federally tariff them. One explanation for this omission may be that BellSouth's intrastate rates for these blocking and screening services are several thousand percent greater than its cost. BellSouth's costs for central office blocking and screening and billed number screening for South Carolina are attached as Exhibit 2. The cost for central office blocking and operator screening per line is only \$.01 per month. The tariffed monthly rate ranges from \$2.00 to \$4.00. The cost for billed number screening is \$.026 per inquiry. However, BellSouth properly charges the IXC for these inquiries, so, BellSouth's effective cost to provide billed number screening to IPPs is zero. The tariffed monthly rate for billed number screening is \$1.00.

In addition to BellSouth's glaring omission of its blocking and screening features, its assertions regarding answer supervision are based upon an untenable interpretation of the Order. BellSouth must federally tariff answer supervision since that feature is not "generally available to all local exchange customers." Answer supervision is a specialized product that is more than just "incidental to payphone service." BellSouth's contention that the term "payphone-specific" means "offered exclusively to payphone customers" must be rejected.

The Order requires BellSouth to advise of the "status of the intrastate tariffs for

⁴Id. ¶ 18. The listed features that must be federally tariffed also plainly meet this test.

⁵BellSouth also offers Coin Refund and Repair on an unbundled basis in every BellSouth state. While this service is not specifically listed in the Order, it clearly meets the Order's test that requires this feature to be filed at the interstate level.

Mr. William F. Caton
April 14, 1997
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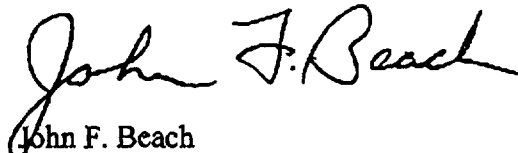
the unbundled features and functions that it has not yet federally tariffed.”⁶ In this regard, BellSouth fails to advise the FCC that IPPs have initiated proceedings in at least three BellSouth states protesting its rates for the basic payphone line and unbundled features.⁷ The petitioners in those proceedings have contended that BellSouth’s rates for these services must be significantly reduced in order to be cost based. Furthermore, no Commission in a BellSouth state has conducted the FCC-required review of LEC tariffs for basic payphone lines and unbundled features.⁸ These facts, and the cost information attached, present a *prima facie* showing that BellSouth is not entitled to receive dial around compensation as of April 15, 1997.

Based upon BellSouth’s indisputable failure to comply with the intrastate and interstate tariffing requirements set forth in the *Payphone Orders*, the SPCC respectfully requests the Commission enter an order declaring that BellSouth is not eligible for dial around compensation. For this same reason, the SPCC also asks for an order rejecting BellSouth’s CEI Plan until the Plan fully complies with the Commission’s tariffing requirements.

With kind regards, I am

Very truly yours,

BEACH LAW FIRM, P.A.



John F. Beach
Attorney for the Southeastern Public
Communications Coalition

cc: Radhika Karmarkar, Esquire (w/encl.)
Mr. Ben G. Almond (w/encl.)
Mr. John B. Muleta (w/encl.)
Michael Carrowitz, Esquire (w/encl.)

⁶*Id.*, ¶ 34. [emphasis added]

⁷Parties have filed initiated such proceedings in Georgia, North Carolina, and South Carolina. The SPCC believes that IPPs have also raised similar concerns through intervention in pending BellSouth payphone service tariff revisions in other BellSouth states.

⁸*Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-128, *Report and Order*, FCC 96-388, released September 20, 1996 (“*Report and Order*”), *Order on Reconsideration*, FCC 96-439, released November 8, 1996 (“*Order on Reconsideration*”) ¶¶ 162-163. (Collectively the *Payphone Orders*.)

EXHIBIT 1

BellSouth South Carolina Payphone Tariff Provisions For Unbundled Features

EFFECTIVE: July 20, 1993

A7. COIN TELEPHONE SERVICE

A7.4 Public Telephone Access Service For Customer Provided Equipment (CPE) (Cont'd)

A7.4.2 Responsibility of the Subscriber (Cont'd)

C. (Cont'd)

12. Access to the presubscribed interLATA operator may be provided by 00- or 0+ for interLATA calls from each telephone. 00- shall not be used to reach the Company's operator.
13. A telephone directory for the local calling area must be located at the customer-provided pay telephone at all times.

A7.4.3 Violations of Regulations

- A. Where any customer-provided telephone is used and/or connected in violation of this Tariff, the Company will promptly notify the customer of the violation.
- B. Failure of the customer to discontinue such use or to correct the violation *within ten days may result in the suspension or disconnection of the customer's service upon direction of the Public Service Commission until such time as the customer complies with the provisions of this Tariff.*
- C. Any nonpayment of charges billed to the customer by the Company or misuse of tariffed facilities will result in disconnection of the customer's service in accordance with the South Carolina Public Service Commission's Rules and Regulations and other sections of this Tariff.
- D. A charge to reconnect the service when disconnected for a violation of this tariff will apply.

A7.4.4 Optional Service Features

A. Central Office Blocking with Operator Screening

Central Office Blocking with Operator Screening is offered to provide a choice of restrictions at the subscriber's option. Central Office Blocking with operator screening is offered subject to availability of facilities.

1. Option A - Two-Way Service. No restrictions.
2. Option B - Outward Only Service. No other restrictions.
3. Option C - Two-Way Service. Provides screening information to the operator to prevent operator assisted sent-paid calls from being billed to the line. Provides central office blocking of 011 + calls.¹
4. Option D - Outward Only Service. Provides screening information to the operator to prevent operator assisted sent-paid calls from being billed to the line. Provides central office blocking of 011 + calls.¹
5. Option E - Two-Way Service. Provides central office blocking of 7 digit local, 976, 1 + DDD and 1 + 900 calls. Provides screening information to the operator to prevent operator assisted sent-paid calls from being billed to the line. Provides central office blocking of 011 + calls.¹
6. Option F - Outward Only Service. Provides central office blocking of 7 digit local, 976, 1 + DDD and 1 + 900 calls. Provides screening information to the operator to prevent operator assisted sent-paid calls from being billed to the line. Provides central office blocking of 011 + calls.¹

Note 1: 011 + blocking provides central office blocking of calls to numbers outside the North American Numbering Plans.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY
SOUTH CAROLINA
ISSUED: February 15, 1993
BY: President - South Carolina
Columbia, South Carolina

GENERAL SUBSCRIBER SERVICE TARIFF

Fifth Revised Page -
Cancels Fourth Revised Page -

EFFECTIVE: September 9, 1992

A7. COIN TELEPHONE SERVICE**A7.4 Public Telephone Access Service For Customer Provided Equipment (CPE)
(Cont'd)****A7.4.4 Optional Service Features (Cont'd)****A. Central Office Blocking with Operator Screening (Cont'd)**

7. Option G - Two-Way Service. Provides central office blocking of 976, 1+DDD and 1+900 calls. Provides screening information to the operator to prevent operator assisted sent-paid calls from being billed to the line. Provides central office blocking of 011+ calls.¹
8. Option H - Outward Only Service. Provides central office blocking of 976, 1+DDD and 1+900 calls. Provides screening information to the operator to prevent operator assisted sent-paid calls from being billed to the line. Provides central office blocking of 011+ calls.¹

B. Billed Number Screening

1. Billed Number Screening is provided on an optional basis as provided in A7.4.5.A. of this Tariff.
2. Billed Number Screening provides for the blocking of third number or collect calls which would be billed to Public Telephone Access Service for CPE.
3. Special equipment serving the originating caller's location is required to make this feature operable.

a. Where such equipment is installed:

Call attempts which have been screened will not complete. The operator will advise the calling party that alternate billing arrangements will have to be made before the call can be completed.

b. Where such equipment is not installed:

Call attempts on a third number basis will complete but not bill. THEREFORE, ALL SUBSCRIBERS TO BILLED NUMBER SCREENING ARE ADVISED THAT CALLS SO COMPLETED WILL BE THOROUGHLY INVESTIGATED AS FRAUDULENT CALLS. THE PARTY PLACING THESE CALLS WILL BE EXPECTED TO MAKE FULL RESTITUTION, AND WILL BE LEGALLY RESPONSIBLE FOR THEM.

Call attempts on a collect basis and accepted will be billed. PAYMENT FOR THESE CALLS WILL BE EXPECTED.

A7.4.5 Rates and Charges**A. Public Telephone Access Service for CPE - Rates and Charges applied by the Company**

Public Telephone Access Service for CPE is provided on a Measured Rate basis. Where Area Plus[®] service is available, subscribers to Public Telephone Access Service for CPE may choose network access and a usage option from A3.2.3 for any customer-provided pay telephone whether the local messages are charged at ten cents or twenty-five cents.

1. Twenty-five Cents Stations

- a. The following monthly rate is applicable to Public Telephone Access Service for CPE on a per line basis for those telephones from which local messages are charged at twenty-five cents.

(1) Option A

	Monthly Rate	USOC
(a) Per line ²	\$-	1WA

Note 1: 011+ blocking provides central office blocking of calls to numbers outside the North American Numbering Plan.

Note 2: To the monthly rate shown, add an amount equivalent to eighty percent of the business individual line flat rate.

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Fifth Revised Page 5
Cancels Fourth Revised Page 5

EFFECTIVE: September 9, 1994

A7. COIN TELEPHONE SERVICE

A7.4. Public Telephone Access Service For Customer Provided Equipment (CPE)
(Cont'd)

A7.4.5 Rates and Charges (Cont'd)

A. Public Telephone Access Service for CPE - Rates and Charges applied by the Company (Cont'd)

1. *Measured Rate Service for Twenty-five Cents Stations (Cont'd)*

a. (Cont'd)

(2) Option B¹

	Monthly Rate	USOC
(a) Per line ²	\$-	1WG
(3) Option C		
(a) Per line ²	3.00	1WH
(4) Option D ¹		
(a) Per line ²	3.00	1WJ
(5) Option E		
(a) Per line ²	4.00	1WT
(6) Option F ¹		
(a) Per line ²	4.00	1WW
(7) Option G		
(a) Per line ²	3.00	1WZ
(8) Option H ¹		
(a) Per line ²	3.00	1WS

- b. The following measured rate charges apply for calls within the local calling area except those calls which are charged at ten cents and originate from customer-provided public telephones located within the confines of a penal or correctional institution.

Initial Minutes or Fraction Thereof

Additional Minute, Each or
Fraction Thereof

\$04

\$02

Note 1: Options B, D, F and H may be provided at locations for which the Public Service Commission has granted a specific exemption.

Note 2: To the monthly rate shown, add an amount equivalent to eighty percent of the business individual line flat rate.

Note 3: Calls within the local calling area are each charged for at least one (1) minute of use. For local calls that exceed one (1) minute, usage charges are based on conversation time rounded up to the nearest one tenth (1/10) minute.

SOUTHERN BELL TELEPHONE
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SOUTH CAROLINA
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BY: President - South Carolina
Columbia, South Carolina

GENERAL SUBSCRIBER SERVICE TARIFF

Fourth Revised Page S.1
Cancels Third Revised Page S.1

EFFECTIVE: September 9, 1994

A7. COIN TELEPHONE SERVICE

A7.4 Public Telephone Access Service For Customer Provided Equipment (CPE)
(Cont'd)

A7.4.5 Rates and Charges (Cont'd)

A. Public Telephone Access Service for CPE - Rates and Charges applied by the Company (Cont'd)

1. Measured Rate Service for Twenty-five Cents Stations (Cont'd)

4. Except as provided for local calls which are charged at ten cents and originate from customer-provided public telephones located within the confines of a penal or correctional institution for local calls placed any day between 8:00 p.m. and 8:00 a.m., or all day Saturday, Sunday, New Year's Day, Independence Day, Labor Day, Thanksgiving Day and Christmas Day, a fifty percent discount is applicable on measured rate charges.

2. Measured Rate Service for Ten Cents Stations¹

- a. The following monthly rate is applicable to Public Telephone Access Service for CPE on a per line basis for those telephones from which local messages are charged at ten cents.

(1) Option A

	Monthly Rate	USOC
(a) Per line ²	\$-	38M
(2) Option B ³		
(a) Per line ²	-	38Q
(3) Option C		
(a) Per line ²	3.00	38S
(4) Option D ³		
(a) Per line ²	3.00	38T
(5) Option E		
(a) Per line ²	4.00	38V
(6) Option F ³		
(a) Per line ²	4.00	38W
(7) Option G		
(a) Per line ²	3.00	38Y
(8) Option H ³		
(a) Per line ²	3.00	38Z

- b. Measured rate charges for calls within the local calling area defined in 1.4. preceding are applicable.

Note 1: Applies to local message from customer owned telephones located on the site of correctional institutions, low income housing, non-profit hospitals, nursing homes, elementary and secondary schools, social services and locations within one block of low income housing. See A7.1.4.C. for explanation of low income housing.

Note 2: To the monthly rate shown, add an amount equivalent to eighty percent of the business individual line flat rate.

Note 3: Options B, D, F and H may be provided at locations for which the Public Service Commission has granted a specific exemption.

SOUTHERN BELL TELEPHONE
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GENERAL SUBSCRIBER SERVICE TARIFF

First Revised Page 3.1.1
Cancels Original Page 3.1.1

EFFECTIVE: September 9, 1994

A7. COIN TELEPHONE SERVICE**A7.4 Public Telephone Access Service For Customer Provided Equipment (CPE)
(Cont'd)****A7.4.5 Rates and Charges (Cont'd)****A. Public Telephone Access Service for CPE - Rates and Charges applied by the Company (Cont'd)****2. Measured Rate Service for Ten Cents Stations¹ (Cont'd)**

- c. The following monthly rate is applicable to Public Telephone Access Service for CPE on a per line basis for those telephones from which local messages are charged at ten cents and are located within the confines of a penal or correctional institution.

(1) Option A

	Monthly Rate	USOC
(a) Per line ²	\$-	3YN
(2) Option B ³		
(a) Per line ²	-	3Y0

Note 1: Applies to local message from customer owned telephones located on the site of correctional institutions, low income housing, non-profit hospitals, nursing homes, elementary and secondary schools, social services and locations within one block of low income housing. See A7.1.4.C. for explanation of low income housing.

Note 2: To the monthly rate shown, add an amount equivalent to eighty percent of the business individual line flat rate.

Note 3: Options B, D, F and H may be provided at locations for which the Public Service Commission has granted a specific exemption.

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A7. COIN TELEPHONE SERVICE

A7.4 Public Telephone Access Service For Customer Provided Equipment (CPE)
(Cont'd)

A7.4.5 Rates and Charges (Cont'd)

A. Public Telephone Access Service for CPE - Rates and Charges applied by the Company (Cont'd)

2. Measured Rate Service for Ten Cents Stations (Cont'd)

c. (Cont'd)

(3) Option C

(a) Per line¹

Monthly Rate	USOC
\$2.00	3YS

(4) Option D²

(a) Per line¹

2.00	3YT
------	-----

(5) Option E

(a) Per line¹

4.00	3YV
------	-----

(6) Option F²

(a) Per line¹

4.00	3YW
------	-----

(7) Option G

(a) Per line¹

3.00	3YY
------	-----

(8) Option H²

(a) Per line¹

3.00	3YZ
------	-----

d. The following measured rate charges apply for calls within the local calling area which are charged at ten cents and originate from customer-provided public telephones located within the confines of a penal or correctional institution.³

Initial Minute or Fraction Thereof

Additional Minute, Each or
Fraction Thereof

\$0.02

\$0.01

e. For local calls originating from customer-provided public telephones located within the confines of a penal or correctional institution and placed any day between 8:00 p.m. and 8:00 a.m., or all day on Saturday, Sunday, New Year's Day, Independence Day, Labor Day, Thanksgiving Day and Christmas Day, the following measured rate charges are applicable:³

Initial Minute or Fraction Thereof

Additional Minute, Each or
Fraction Thereof

\$0.01

\$0.01

Note 1: To the monthly rate shown, add an amount equivalent to eighty percent of the business individual line flat rate.

Note 2: Options B, D, F and H may be provided at locations for which the Public Service Commission has granted a specific exemption.

Note 3: Calls within the local calling area are each charged for at least one (1) minute of use. For local calls that exceed one (1) minute, usage charges are based on conversation time rounded up to the nearest one tenth (1/10) minute.

SOUTHERN BELL TELEPHONE
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SOUTH CAROLINA
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Columbia, South Carolina

GENERAL SUBSCRIBER SERVICE TARIFF

First Revised Page 3.3
Cancels Original Page 3.3

EFFECTIVE: September 9, 1994

A7. COIN TELEPHONE SERVICE

A7.4 Public Telephone Access Service For Customer Provided Equipment (CPE)
(Cont'd)

A7.4.5 Rates and Charges (Cont'd)

A. Public Telephone Access Service for CPE - Rates and Charges applied by the Company (Cont'd)

3. Area Plus Service

a. The following monthly rate is applicable to Public Telephone Access Service for CPE on a per line basis for those telephones that subscribe to Area Plus Service in addition to c. and d. following.

b. Options

(1) Per Line for Twenty-Five Cents Stations

	Monthly Rate	USOC	
(a) Option A	\$-	APA	(N)
(b) Option B ¹	-	APD	(N)
(c) Option C	3.00	APE	(N)
(d) Option D ¹	3.00	APG	(N)
(e) Option E	4.00	APH	(N)
(f) Option F ¹	4.00	APJ	(N)
(g) Option G	3.00	APK	(N)
(h) Option H ¹	3.00	APL	(N)

(2) Per Line for Ten Cents Stations

(a) Option A	-	APD	(N)
(b) Option B ¹	-	AP3	(N)
(c) Option C	3.00	AP4	(N)
(d) Option D ¹	3.00	AP6	(N)
(e) Option E	4.00	AP7	(N)
(f) Option F ¹	4.00	AP8	(N)
(g) Option G	3.00	AP9	(N)
(h) Option H ¹	3.00	AP5	(N)

c. Access Line Rate

The appropriate business access line rate as described in A3.2.3 of this Tariff apply.

d. Local Usage

The rates and regulations for local usage in A3.2.3 of this Tariff are applicable with the exception of A3.2.3.B.2.c. Public Telephone Access Service for CPE is not subject to the billed usage limit.

4. Billed Number Screening

a. The following monthly rates are applicable for Billed Number Screening.

(1) Per line screened

(a) Each	1.00	PSES1	
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Note 1: Options B, D, F and H may be provided at locations for which the Public Service Commission has granted a specific exemption.

Note 2: Calls within the local calling area are each charged for at least one (1) minute of use. For local calls that exceed one (1) minute, usage charges are based on conversation time rounded up to the nearest one tenth (1/10) minute.

BELLSOUTH
TELECOMMUNICATIONS, INC.
SOUTH CAROLINA
ISSUED: September 16, 1996
BY: President - South Carolina
Columbia, South Carolina

GENERAL SUBSCRIBER SERVICE TARIFF

Second Revised Page 13
Cancels First Revised Page 13

EFFECTIVE: October 16, 1996

A7. COIN TELEPHONE SERVICE**A7.8 SmartLine[®] Service for Public Telephone Access (Cont'd)****A7.8.2 Rates and Charges (Cont'd)**

- F. Sent paid intraLATA long distance calls will be rated to the end user at the long distance rate and the appropriate operator surcharge set forth in Section A18. of this Tariff. The SmartLine[®] service subscriber will be charged the long distance rate set forth in Section A18.
- G. Non-sent paid intraLATA toll calls will be rated to the end user at the long distance rate and the appropriate operator surcharge set forth in Section A18. of this Tariff.
- H. Touch-Tone Calling Service will be provided at rates specified in Section A13. of this Tariff for business individual line service.
- I. The SmartLine[®] service subscriber will be charged for Directory Assistance Service at the rate specified in Sections A3. and A18. of this Tariff.
- J. Service charges as covered in Section A4. of this Tariff for business individual line service are applicable.
- K. Listings in connection with SmartLine[®] service are furnished under the regulations specified in Section A6. of this Tariff for Company and Customer Owned Telephone Service.
- L. Suspension of service, as covered in Section A2., is not available unless the instrument is totally inaccessible to the general public on a temporary basis. In all cases, the decision to permit temporary suspension of service rests with the Company.
- M. When service is temporarily suspended at the subscriber's request, a Line Change Charge as specified in Section A4. will be charged for each telephone number restored.
- N. Rates for Verification and Emergency Interrupt Service as provided in Sections A3. and A18. of this Tariff are applicable. The network will require a deposit be made by the end user unless charged to an alternate billing method.

A7.9 Reserved For Future Use**A7.10 Coin Refund and Repair Referral Service (CRS)****A7.10.1 General**

- A. Coin Refund and Repair Referral Service (CRS) provides handling of refund requests and repair referrals generated by the end users of Independent Payphone Provider (IPP) public telephones. End users may request refunds for coins lost during an attempt to place local, intraLATA, or interLATA calls and/or submit repair/trouble reports for the IPP public telephone to the Company's operator services.
- B. CRS is available to any IPP outside confinement facilities which also subscribes to Operator Screening. CRS will not be provided for pay telephones located in confinement facilities.

A7.10.2 Regulations

- A. All access lines subscribed to CRS must be subscribed to the same option.
- B. The IPP public telephone must include detailed instructions on how to obtain refund and repair referral assistance.
- C. The Coin Refund portion of the service will be provided on one of the following options:
 - 1. Option 1 - The Company operator will take the refund request from the end user and forward the information to the IPP for processing.
 - 2. Option 2 - The Company operator will take the refund request from the end user. If the request is for a credit to the end user's account with the Company, the operator will issue the credit. Any other refund request will be forwarded to the IPP for processing.
 - 3. Option 3 - The Company operator will take the refund request from the end user and issue a credit or draft as requested by the end user.
- D. Repair referral service will be offered with any of the coin refund options or on a stand alone basis. The Company operator will take the repair report from the end user and refer to the IPP for handling.

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EFFECTIVE: October 16, 1996

A7. COIN TELEPHONE SERVICE**A7.10 Coin Refund and Repair Referral Service (CRS) (Cont'd)****A7.10.2 Regulations (Cont'd)**

- E. In the case of system outages or lost data, the Company shall have no liability and shall not be responsible for providing refunds or repair referrals to the end user.
- F. Charges for CRS and the amounts of the refunds to the end user will be made based solely on the Company's refund request data.
- G. Non-payment of charges for CRS may result in the interruption of the IPP's access line service.
- H. Any request that results in a repair referral and a refund referral will be charged as two referrals.
- I. IPPs requesting to terminate CRS after subscribing lines to the service must give the Company thirty days advance notice. The IPP will be responsible for the charges incurred for CRS during the thirty day termination period. The IPP will also be responsible for any changes to its payphones and/or instruction cards after the service has been interrupted, terminated or disconnected.

A7.10.3 Rates and Charges

- A. The rates listed in 2 and 3 following are in addition to the actual amount of the refund.

1. Option 1

	Rate	USOC	
(a) per referral	\$1.60	NA	(N)

2. Option 2

(a) per referral	1.60	NA	(N)
(b) per credit	1.68	NA	(N)

3. Option 3

(a) per credit	1.68	NA	(N)
(b) per draft	2.48	NA	(N)

4. Repair Referral

(a) per referral	1.60	NA	(N)
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EXHIBIT 2

**BellSouth South Carolina
Costs for
For Unbundled Features**

~~RECEIVED~~
JOHN F. BENCH, P.A.

AUG 2 1995

Southern Bell Tel & Tel Co.
SCFSC Docket No. 95-720-C
SCPCA's 1st Set of Interrogatories
July 18, 1995
Item No. 1-1
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REQUEST: In exhibit A of your Application for Alternative Regulation, you state "B.(1) Prices for interconnection service shall equal of (sic) exceed the company's LRIC of providing such service". Provide your LRIC, divided into flat-rated monthly and usage-sensitive, per-minute costs, for providing public telephone access service for customer-provided equipment. If this information is not available in the form requested, please so state and provide the information in whatever form available.

RESPONSE: Some of the requested information is proprietary and will be provided upon the execution of an appropriate proprietary agreement with Southern Bell. Following is the non-proprietary data requested:

Flat-rated monthly costs per station:

Loop costs..... \$15.91
NTS line term costs..... \$1.84

Usage sensitive costs per Local Measured MOU:

1st MOU (peak)..... \$
1st MOU (off-peak)..... \$
Additional MOU (peak)..... \$
Additional MOU (off-peak)..... \$

Central Office Blocking with Operator Screening costs:

Non-volume sensitive one-time cost
per central office..... \$62.86
Shared monthly cost
per central office..... \$0.32
Directly assigned monthly cost
per line..... \$0.01

Billed Number Screening costs:

Cost per query..... \$0.026

RESPONSE PROVIDED BY:

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